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Attorneys for Defendant
USAA CASUALTY INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 | DINA BARELA, individually.

CASE NO : 2:21-cv-00084-RFB-NJK

13 Plaintiff

**STIPULATION AND ORDER TO EXTEND
STAY OF DISCOVERY PENDING THE
OUTCOME OF PRIVATE MEDIATION**

15 USAA CASUALTY INSURANCE
16 COMPANY, DOES 1 through 20, ROE
17 BUSINESS ENTITIES I through 20, inclusive
jointly and severally.

(First Request)

Defendants.

19 ROBERT W. FREEMAN

20 COMES NOW, Plaintiff DINA BARELA (“Barela”) and Defendant USAA
21 CASUALTY INSURANCE COMPANY (“USAA-CIC”), by and through their respective counsel
22 of record and hereby stipulate and make joint application (First Request) to extend the stay of
23 discovery in this matter entered on October 19, 2021 until such time as the parties conclude a
24 mediation to which the parties have agreed. (ECF No. 27) The mediation previously scheduled
25 for November 17, 2021 has been moved to December 2, 2021.

**LEWIS
BRISBOIS
BISGAARD
& SMITH LLP**
ATTORNEYS AT LAW

1 Good cause exists to continue the stay of discovery in this matter. Specifically, the parties
2 had previously scheduled mediation for November 17, 2021 with the Honorable Nancy Saitta,
3 which was the earliest timeframe all parties/counsel and the mediator could be available. However,
4 on the day of the mediation, hours prior to commencement, Plaintiff had to cancel and postpone the
5 mediation due to a sudden personal emergency. As a result, the parties agreed to continue the
6 November 17th scheduled mediation. Judge Saitta has rescheduled the mediation to December 2,
7 2021. As such this joint request is made to extend the stay of discovery until after the mediation on
8 December 2, 2021.

9 The stay of discovery will allow the parties to explore the possibility of settlement through
10 mediation without incurring the time and expense of ongoing discovery prior to the mediation.

11 Within 14 days after completion of the mediation, the parties will submit a Stipulation and
12 Order reflecting resolution of some or all of the claims and/or advise the Court that the parties were
13 unable to resolve the claims and will submit new discovery deadlines, including the rebuttal expert
14 deadlines, discovery cutoff deadline (providing ample time to complete written

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1 discovery and depositions), deadline for filing dispositive motions and the deadline for filing the
2 Joint Pretrial Order.

3 DATED this 19th day of November, 2021

DATED this 19th day of November, 2021

4 Attorneys for Plaintiff

Attorneys for Defendant

5 Approved for e-signature:

Approved for e-signature

6 /s/ Samantha A. Martin
7 BENJAMIN P. CLOWARD, ESQ.
Nevada Bar No. 11087
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Nevada Bar No. 12998
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/s/ Jennifer A. Taylor
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ORDER

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The parties must file a status report no later than December 16, 2021. Additionally, if
the case does not settle at mediation, the parties must file a revised joint proposed
discovery plan no later than December 16, 2021.

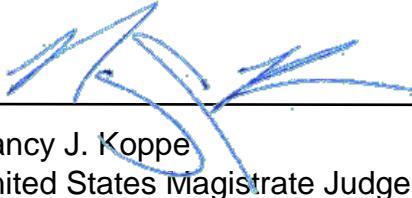
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IT IS SO ORDERED.

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Dated: November 22, 2021



Nancy J. Koppe
United States Magistrate Judge

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